

REMARKS

Reconsideration of the application is respectfully requested for the following reasons:

1. Amendments to Specification and Claims

The specification and claims have been revised to correct various minor grammatical and/or idiomatic errors. Because the changes are all formal in nature, it is respectfully submitted that they do not involve new matter.

2. Rejection of Claims 1-3, 6, and 8-12 Under 35 USC §102(b) in view of U.S. Patent No. 5,191,276 (Zainaleain)

This rejection is respectfully traversed on the grounds that the Zainaleain patent neither discloses nor suggests a mobile computer tilting arrangement in which a plug that supports the computer in a tilted position is press-fit into a locating hole, and **radially expanded** by a pin inserted into a through hole of the plug to securely support the computer. Instead, Zainaleain teaches a battery charger including **female banana plugs** supported by nuts, with no suggestion that the female banana plugs are to be expanded into frictional engagement by pins inserted into center through holes of the plugs. The alleged “pins” of Zainaleain are merely **male banana plugs**, which are not used to radially expand and hold the female banana plugs in place, but rather to establish an electrical connection.

According to the Examiner, element 42 of Zainaleain corresponds to the claimed plug and element 54 to the claimed pin. However, plug 42 of Zainaleain does not extend from a mobile computer to support the mobile computer, and is clearly not **radially expanded** by the pin 54 into friction engagement with the locating hole. Instead, elements 42 of Zainaleain are **female banana plugs** fixed to the housing 10, and elements 54 are male banana plugs inserted into the female banana plugs. There is no suggestion that male banana plugs 54 of Zainaleain radially expand female banana plugs 42, nor are the female banana plugs 54 mounted in, and extended from, recesses in the manner claimed. To the contrary, if the female banana plugs 42 were to be

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extended in a computer support position, it would be impossible to plug in a male banana plug, and the arrangement of Zainaleain would be rendered **inoperative**.

Claim 1 specifically recites that:

*. . .said plugs each comprising a center through hole, and a pin insertable into said center through hole **to radially expand** the respective plug into friction engagement with one of said at least two recessed locating holes of said casing into which the respective plug is press-fitted. . . .*

The purpose of the radial expansion is to secure the plugs so that they support a mobile computer, while enabling adjustment of plug position upon removal of the pins. This claimed use of pins to frictionally hold computer support plugs in place has **absolutely nothing to do with** Zainaleain's mounting of female banana plugs in a battery charger, or with plugging male banana plugs into the female banana plugs.

In addition to lacking the radial plug expansion of claim 1, Zainaleain fails to disclose or suggest a recess as recited in claim 4 (for accommodating a portion of the pull tab), the finger notch of claim 5, ribs on the plug as recited in claim 6, peripherally ribbed locating hole walls as recited in claim 8, and the pull tab of claims 10-12. There is no possible reason why the ordinary artisan would include these features on either a male or female banana plug of the type disclosed by Zainaleain.

Because the Zainaleain does not disclose all elements recited in the claims corresponding to original claims 1-12, 16, and 18, withdrawal of the rejection under 35 USC §102(b) is respectfully requested.

3. Rejection of Claim 7 Under 35 USC §103(a) in view of U.S. Patent Nos. 5,191,276 (Zainaleain) and 6,752,264 (Versluys)

This rejection is respectfully traversed on the grounds that the Versluys patent, like the Zainaleain patent, fails to disclose or suggest mobile computer supports held in frictional engagement with locating holes by pins, as claimed. Instead, the Versluys patent discloses a

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rubber stopper 52, which does not even remotely resemble that of the claimed invention. The rubber stopper 52 of Versluys does not have a through hole, does not perform a supporting function, and is not held in place by a pin inserted into the through hole to expand the rubber stopper into frictional engagement with a locating hole.

Furthermore, the proposed *combination* of Versluys and Zainaleain makes no sense whatsoever. There is no possible way that an ordinary artisan would consider Versluys' teaching of a rubber stopper applicable to a banana plug of the type taught by Zainaleain. A female banana plug of the type taught by Zainaleain is intended to conduct electricity, and rubber does not conduct electricity.

A combination which does not take into account the actual teachings of the references, in the manner that the ordinary artisan would have considered them, *i.e.*, **as a whole** and without the benefit of a template stating which teachings to consider and which to ignore, could only be based on impermissible hindsight. As explained in **MPEP 2143.02** (page 2100-111):

*If proposed modification would render the prior art invention being modified **unsatisfactory for its intended purpose**, then there is no suggestion or motivation to make the proposed modification"* (citing *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984)).

It is respectfully submitted that the proposed combination of a female banana plug made of rubber is just such a modification that would render the prior art invention being modified unsatisfactory for its intended purpose (See also, MPEP 2141.02, p. 2100-107 "**A prior art reference must be considered in its entirety, i.e., as a whole, including portions that would lead away from the claimed invention** (emphasis in the original)).

Because neither the Zainaleain patent nor the Versluys patent, whether considered individually or in any reasonable combination, discloses or suggests the claimed mobile computer support held in place by radial expansion of a plug in a locating hole by a pin, much less the support being in the form of a rubber plug, it is respectfully submitted that the rejection of claim 7 under 35 USC §103(a) is improper and should be withdrawn.

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Having thus overcome each of the rejections made in the Official Action, withdrawal of the rejections and expedited passage of the application to issue is requested.

Respectfully submitted,

BACON & THOMAS, PLLC

A handwritten signature in black ink, appearing to read 'B. Urcia', with a long horizontal flourish extending to the right.

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